

EXHIBIT A

ALABAMA SJIS CASE DETAIL

**PREPARED FOR: JOHN SCOTT**
10/19/2023 12:28:38 PMCounty: **02** Case Number: **CV-2023-901992.00** Court Action:
Style: **THOMAS A BURNS V. BRAND SAFWAY SOLUTIONS**

Real Time

Case

Case Information

County:	02-MOBILE	Case Number:	CV-2023-901992.00	Judge:	SWP:S. WESLEY PIPES
Style:	THOMAS A BURNS V. BRAND SAFWAY SOLUTIONS				
Filed:	09/25/2023	Case Status:	ACTIVE	Case Type:	CIVIL RIGHTS
Trial Type:	BENCH	Track:	STANDARD	Appellate Case:	0
No of Plaintiffs:	1	No of Defendants:	1		

Damages

Damage Amt:	0.00	Punitive Damages:	0.00	General Damages:	0.00
No Damages:		Compensatory Damages:	0.00		
Pay To:		Payment Frequency:		Cost Paid By:	

Court Action

Court Action Code:		Court Action Desc:		Court Action Date:	
Num of Trial days:	0	Num of Liens:	0	Judgment For:	
Disposition Date of Appeal:		Disposition Judge:	:	Disposition Type:	
Revised Judgement Date:		Minstral:		Appeal Date:	
Date Trial Began but No Verdict (TBNV1):					
Date Trial Began but No Verdict (TBNV2):					

Comments

Comment 1:
Comment 2:

Appeal Information

Appeal Date:	Appeal Case Number:	Appeal Court:
Appeal Status:	Orgin Of Appeal:	
Appeal To:	Appeal To Desc:	LowerCourt Appeal Date:
Disposition Date Of Appeal:	Disposition Type Of Appeal:	

Administrative Information

Transfer to Admin Doc Date:	Transfer Reason:	Transfer Desc:
Number of Subponeas:	Last Update: 10/03/2023	Updated By: MAG

Parties

Party 1 - Plaintiff INDIVIDUAL - BURNS THOMAS A

Party Information

Party:	C001-Plaintiff	Name:	BURNS THOMAS A	Type:	I-INDIVIDUAL
Index:	D BRAND SAFWAY	Alt Name:		Hardship:	Yes JID: SWP
Address 1:	7200 MELISSA DR	Phone:	(205) 000-0000		

Address 2:
City: THEODORE
SSN: XXX-XX-X999

State: AL
DOB:

Doc# 1-2
Filed 10/19/23

Page 3 of 20
PageID# 11

Zip: 36582-0000
Country: US
Sex: Race:

Court Action

Court Action:
Amount of Judgement: \$0.00
Cost Against Party: \$0.00
Comment: 10/3/23: C & S SENT.
Warrant Action Date:

Court Action For:
Other Cost: \$0.00
Warrant Action Status:

Court Action Date:
Exemptions:
Date Satisfied:
Arrest Date:
Status Description:

Service Information

Issued:
Return:
Served:
Answer:

Issued Type:
Return Type:
Service Type
Answer Type:

Reissue:
Return:
Service On:
Notice of No Service:

Reissue Type:
Return Type:
Notice of No Answer:
Served By:

Attorneys

Number	Attorney Code	Type of Counsel	Name	Email	Phone
Attorney 1	000000		PRO SE		

Party 2 - Defendant BUSINESS - BRAND SAFWAY SOLUTIONS

Party Information

Party: D001-Defendant
Index: C BURNS THOMAS
Address 1: 3512 BROOKDALE DR
Address 2:
City: MOBILE
SSN: XXX-XX-X999

Name: BRAND SAFWAY SOLUTIONS
Alt Name:
State: AL
DOB:

Type: B-BUSINESS
JID: SWP
Hardship: No
Phone: (205) 000-0000
Zip: 36608-0000
Country: US
Sex: Race:

Court Action

Court Action:
Amount of Judgement: \$0.00
Cost Against Party: \$0.00
Comment:
Warrant Action Date:

Court Action For:
Other Cost: \$0.00
Warrant Action Status:

Court Action Date:
Exemptions:
Date Satisfied:
Arrest Date:
Status Description:

Service Information

Issued: 10/03/2023
Return:
Served:
Answer:

Issued Type: S-SHERIFF
Return Type:
Service Type
Answer Type:

Reissue:
Return:
Service On:
Notice of No Service:

Reissue Type:
Return Type:
Notice of No Answer:
Served By:

Attorneys

Number	Attorney Code	Type of Counsel	Name	Email	Phone
Attorney 1	000000		PRO SE		

Financial

Fee Sheet

Fee Status	Admin Fee	Fee Code	Payor	Payee	Amount Due	Amount Paid	Balance	Amount Hold	Garnish Party
ACTIVE	N	CV05	C001	000	\$315.00	\$0.00	\$315.00	\$0.00 0	
ACTIVE	N	VADM	C001	000	\$45.00	\$0.00	\$45.00	\$0.00 0	
Total:					\$360.00	\$0.00	\$360.00	\$0.00	

Case Action Summary					
Date:	Time	Code	Comments	Operator	
9/25/2023	2:09 PM	ECOMP	COMPLAINT E-FILED.	000000	
9/25/2023	2:15 PM	FILE	FILED THIS DATE: 09/25/2023 (AV01)	CHL	
9/25/2023	2:15 PM	EORD	E-ORDER FLAG SET TO "Y" (AV01)	CHL	
9/25/2023	2:15 PM	ASSJ	ASSIGNED TO JUDGE: S. WESLEY PIPES (AV01)	CHL	
9/25/2023	2:15 PM	SCAN	CASE SCANNED STATUS SET TO: N (AV01)	CHL	
9/25/2023	2:15 PM	TDMN	BENCH/NON-JURY TRIAL REQUESTED (AV01)	CHL	
9/25/2023	2:15 PM	STAT	CASE ASSIGNED STATUS OF: ACTIVE (AV01)	CHL	
9/25/2023	2:15 PM	ORIG	ORIGIN: INITIAL FILING (AV01)	CHL	
9/25/2023	2:15 PM	C001	C001 PARTY ADDED: BURNS THOMAS A (AV02)	CHL	
9/25/2023	2:15 PM	C001	INDIGENT FLAG SET TO: N (AV02)	CHL	
9/25/2023	2:15 PM	C001	LISTED AS ATTORNEY FOR C001: PRO SE (AV02)	CHL	
9/25/2023	2:15 PM	C001	C001 E-ORDER FLAG SET TO "Y" (AV02)	CHL	
9/25/2023	2:15 PM	D001	D001 PARTY ADDED: BRAND SAFWAY SOLUTIONS (AV02)	CHL	
9/25/2023	2:15 PM	D001	INDIGENT FLAG SET TO: N (AV02)	CHL	
9/25/2023	2:15 PM	D001	LISTED AS ATTORNEY FOR D001: PRO SE (AV02)	CHL	
9/25/2023	2:15 PM	D001	D001 E-ORDER FLAG SET TO "Y" (AV02)	CHL	
10/3/2023	11:08 AM	JEORDE	ORDER E-FILED - AFFIDAVIT OF SUBSTANTIAL HARDSHIP GRANTED - RENDERED & ENTERED: 10/3/2023 11:08:32 AM	J	
10/3/2023	11:08 AM	C001	INDIGENT FLAG SET TO: Y (AV02)	AJA	
10/3/2023	11:08 AM	D001	SHERIFF ISSUED: 10/03/2023 TO D001 (AV02)	AJA	
10/3/2023	12:15 PM	TRAC	CASE ASSIGNED TO: STANDARD TRACK (AV01)	MAG	
10/3/2023	12:16 PM	ESERV	NOTICE OF COMPLAINT FILING SENT TO SHERIFF'S OFFICE ON 10/3/2023	MAG	
10/3/2023	12:16 PM	ESERV	SERVICE DOCUMENT - PRE TRIAL ORDER	MAG	
10/3/2023	2:25 PM	COMM	10/3/23: C & S SENT. (AV02)	MAG	

Images					
Date:	Doc#	Title	Description	Pages	
9/25/2023 2:09:41 PM	1	AFFIDAVIT OF SUBSTANTIAL HARDSHIP	hardship affidavit	2	
9/25/2023 2:09:42 PM	2	COMPLAINT	complaint	6	
10/3/2023 11:08:35 AM	3	ORDER ON AFFIDAVIT OF SUBSTANTIAL HARDSHIP	ORDER ON AFFIDAVIT OF SUBSTANTIAL HARDSHIP	1	
10/3/2023 11:08:36 AM	4	COMPLAINT - TRANSMITTAL	E-NOTICE TRANSMITTALS	1	
10/3/2023 11:08:37 AM	5	COMPLAINT - SUMMONS	E-NOTICE TRANSMITTALS	1	
10/3/2023 11:08:41 AM	6	ORDER - TRANSMITTAL	E-NOTICE TRANSMITTALS	2	
10/3/2023 12:16:09 PM	7	PRE TRIAL ORDER	GENERAL PRE-TRIAL ORDER	3	



END OF THE REPORT



State of Alabama Unified Judicial System Form C-10 Page 1 of 2 Rev. 2/95	AFFIDAVIT OF SUBSTANTIAL HARDSHIP AND ORDER	Case Number
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IN THE CIRCUIT COURT OF MOBILE COUNTY, ALABAMA
(Circuit, District, or Municipality) (Name of County or Municipality)

STYLE OF CASE: THOMAS A. BURNS v. BRANDTAP SOLUTIONS
Plaintiff(s) Defendant(s)

TYPE OF PROCEEDING: CIVIL SUIT CHARGE(s) (if applicable): INDIGENT

☒ **CIVIL CASE-** I, because of substantial hardship, am unable to pay the docket fee and service fees in this case. I request that payment of these fees be waived initially and taxed as costs at the conclusion of the case.

☐ **CIVIL CASE-** (such as paternity, support, termination of parental rights, dependency) - I am financially unable to hire an attorney and I request that the court appoint one for me.

☐ **CRIMINAL CASE-** I am financially unable to hire an attorney and request that the court appoint one for me.

☐ **DELINQUENCY/NEED OF SUPERVISION-** I am financially unable to hire an attorney and request that the court appoint one for my child/ma

AFFIDAVIT

SECTION 1.

1. IDENTIFICATION

Full name THOMAS A. BURNS Date of Birth 07-11-56

Spouse's full name (if married) N/A

Complete home address 2700 MELISSA DR. THEODORE, AL 36582

Number of people living in household 1 **REDACTED**

Home telephone number UNEMPLOYED Length of employment REDACTED

Occupation/Job UNEMPLOYED Social Security Number REDACTED

Driver's license number NONE Employer REDACTED Employer's telephone number REDACTED

Employer's address REDACTED

2. ASSISTANCE BENEFITS

Do you or anyone residing in your household receive benefits from any of the following sources? (If so, please check those which apply)

☐ AFDC ☒ Food Stamps ☒ SSI ☐ Medicaid ☐ Other _____

3. INCOME/EXPENSE STATEMENT

Monthly Gross Income:

Monthly Gross Income \$ 857.00

Spouse's Monthly Gross Income (unless a marital offense) _____

Other Earnings: Commissions, Bonuses, Interest Income, etc. _____

Contributions from Other People Living in Household _____

Unemployment/Workmen's Compensation, Social Security, Retirements, etc. _____

Other Income (be specific) _____

TOTAL MONTHLY GROSS INCOME \$ 857.00

Monthly Expenses:

A. Living Expenses

Rent/Mortgage \$ 500.00

Total Utilities: Gas, Electricity, Water, etc. _____

Food _____

Clothing _____

Health Care/Medical _____

Insurance _____

Car Payment(s)/Transportation Expenses _____

Loan Payment(s) _____

***OPTIONAL**

Form C-16 Page 2 of 2 Rev. 2/99		AFFIDAVIT OF SUBSTANTIAL HARDSHIP AND ORDER	
Monthly Expenses:(cont'd page 1) Credit Card Payment(s) _____ Educational/Employment Expenses _____ Other Expenses (be specific) <u>100 T</u> _____ _____ <div style="text-align: right;">Sub-Total A \$ _____</div>			
B. Child Support Payment(s)/Alimony \$ _____ <div style="text-align: right;">Sub-Total B \$ _____</div>			
C. Exceptional Expenses \$ <u>100 T</u> <div style="text-align: right;">TOTAL MONTHLY EXPENSES (add subtotals from A & B monthly only) \$ <u>600⁰⁰ T</u></div>			
<div style="text-align: right;">Total Gross Monthly Income Less total monthly expenses: DISPOSABLE MONTHLY INCOME \$ <u>257¹⁰</u></div>			
4. LIQUID ASSETS: Cash on Hand/Bank (or otherwise available such as stocks, bonds, certificates of deposit) \$ <u>0</u> Equity in Real Estate (value of property less what you owe) <u>0</u> Equity in Personal Property, etc. (such as the value of motor vehicles, stereo, VCR, furnishing, jewelry, tools, guns, less what you owe) <u>0</u> Other (be specific) _____ Do you own anything else of value? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No (land, house, boat, TV, stereo, jewelry) If so, describe _____ <div style="text-align: right;">TOTAL LIQUID ASSETS \$ <u>0</u></div>			
5. Affidavit/Request I swear or affirm that the answers are true and reflect my current financial status. I understand that a false statement or answer to any question in the affidavit may subject me to the penalties of perjury. I authorize the court or its authorized representative to obtain information pertaining to my financial status from any source in order to verify information provided by me. I further understand and acknowledge that, if the court appoints an attorney to represent me, the court may require me to pay all or part of the fees and expenses of my court-appointed counsel. <div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> <p>Sworn to and subscribed before me this <u>10</u> day of <u>September</u> 20<u>23</u></p> <p><u>Jimmie J. Clunk</u> Notary Public/Notary</p> </div> <div style="width: 45%; text-align: right;"> <p><u>Thomas A. Burns</u> Affiant's Signature</p> <p><u>THOMAS A. BURNS</u> Print or Type Name</p> </div> </div>			
ORDER OF COURT			
SECTION II IT IS THEREFORE ORDERED, AND ADJUDGED BY THE COURT AS FOLLOWS: <input type="checkbox"/> Affiant is not indigent and request is DENIED. <input type="checkbox"/> Affiant is partially indigent and able to contribute monetarily toward his/her defense; therefore defendant is ordered to pay \$ _____ towards the anticipated cost of appointed counsel. Said amount is to be paid to the clerk of court or as otherwise ordered and disbursed as follows: _____ <input type="checkbox"/> Affiant is indigent and request is GRANTED. <input type="checkbox"/> The prepayment of docket fees is waived.			
IT IS FURTHER ORDERED AND ADJUDGED that _____ is hereby appointed as counsel to represent affiant. IT IS FURTHER ORDERED AND ADJUDGED that the court reserves the right and may order reimbursement of attorney's fees and expenses, approved by the court and paid to the appointed counsel, and costs of court. Done this _____ day of _____			
_____ Judge			



THOMAS A. BURNS
PLAINTIFF

CIRCUIT COURT OF
MOBILE COUNTY
ALABAMA

V

BRAND SAFWAY SOLUTIONS
DEFENDANT

CASE NO. _____

CIVIL COMPLAINT FOR VIOLATION OF
U.S.C.A. FOURTEEN, EQUAL PROTECTION ACT, THE
AMERICAN DISABILITIES ACT, AND THE ALABAMA
MEDICAL MARIJUANA ACT

COMES NOW BEFORE THIS
COURT THOMAS A. BURNS PRO-SE PETITIONER
PLAINTIFF IN THE ABOVE ENTITLED STYLED AND
NUMBERED CAUSE. THE PLAINTIFF WILL RESPECTFULLY
SHOW THE FOLLOWING IN SUPPORT IN THE FOLLOWING:

I
FACTS OF CASE

THE PLAINTIFF BURNS WAS
EMPLOYED WITH BRAND SAFWAY SOLUTIONS AT 3585
SHARES PLACE WEST PALM BEACH FLORIDA ON FEB. 9TH,
2019. ON 6-9-2020 "BURNS" PRESCRIBED MEDICAL
MARIJUANA BY DR. JAVID MUHAMMED FOR RELIEF

CONT.

(1)

OF MULTIPLE SYMPTOMS. BURNS INFORMED HIS SUPERVISORS AT BRAND SAFWAY SOLUTIONS OF THE DOCTORS ORDERS AND THEY WERE SUPPORTIVE OF THE SITUATION. BURNS TRANSFERED TO THE BRANDSAFWAY BRANCH ON JULY 5TH 2021 IN MOBILE, ALABAMA. ON JULY 26TH 2021 BURNS WAS TERMINATED BY SUPERVISOR ROBERT BARLOW BECAUSE BURNS TOLD HIM HE COULDN'T PASS A DRUG SCREEN BECAUSE HE WAS ON MEDICAL MARIJUANA FROM FLORIDA AND THE DRUG SCREEN WOULD SHOW POSITIVE WOULD SHOW "THC". BURNS WAS TERMINATED. NO OPPORTUNITY TO TEST, THE CHANCE TO CLEAN UP, NO OPTIONS OR ALTERNATIVES. BURNS NOW CLAIMS WRONGFUL DISCHARGE AND LOST GAINFUL EMPLOYMENT, INCOME, BENEFITS AND IS NOW AT THIS FILING OF THIS PETITION IS HOMELESS, UNEMPLOYED, ON FOOD STAMPS, AND HAS NO MONEY IN BANK ACCOUNT. THIS ACTION HAS DESTROYED BURNS' LIFE IN MULTIPLE ASPECTS.

II

RELIEF SOUGHT

PUNITIVE DAMAGES OF \$250,000 DOLLARS
TWO HUNDRED AND FIFTY THOUSANDS U.S. DOLLARS
FOR WRONGFUL DISCHARGE, ANGUISH, AND
PAIN AND SUFFERING

III

GROUND FOR RELIEF

ON MAY 17TH 2021 ALABAMA
GOVERNOR KAY IVEY PASSED THE MEDICAL MARIJUANA

CONT

(2)

ACT FOR THE STATE OF ALABAMA. ALABAMA CITED PROVISIONS UNDER THIS ACT AND THE PROVISIONS WERE FROM STATE TO STATE UNDER THE MEDICAL MARIJUANA ACT BECAUSE IT IS NOT FEDERALLY REGULATED. BUT ALABAMA THINKS THE STATE IS SPECIAL. UNDER THE 14TH AMENDMENT OF THE UNITED STATES CONSTITUTION (EQUAL PROTECTION ACT) IT CLEARLY STATES:

NO STATE SHALL MAKE OR ENFORCE ANY LAW WHICH SHALL ABRIDGE PRIVILEGES OF CITIZENS OR IMMUNITIES OF CITIZENS OF THE UNITED STATES. NOR SHALL ANY STATE DEPRIVE ANY PERSON OF LIFE, LIBERTY, OR PROPERTY WITHOUT DUE PROCESS OF LAW NOT TO DENY ANY PERSON WITHIN ITS JURISDICTION, THE EQUAL PROTECTION OF THE LAW. IN CALIFORNIA AB2189 MAKES IT UNLAWFUL FOR AN EMPLOYER TO DISCRIMINATE AGAINST A PERSON IN HIRING, TERMINATION OR ANY TERM OR CONDITION OF EMPLOYMENT, OR OTHERWISE PENALIZING A PERSON IF THE DISCRIMINATION IS BASED UPON THE FOLLOWING: THE PERSONS USE OF CANNABIS OFF THE JOB AND AWAY FROM THE PRACTICE. MASSACHUSETTS AND VERMONT PROTECT MEDICAL MARIJUANA PATIENTS RIGHTS UNDER THEIR DISABILITY LAWS. THE SUPREME COURT OF NEW HAMPSHIRE HAS RULED THAT THE STATES DISABILITY AND ACCOMMODATION LAW LAW COVERS MEDICAL MARIJUANA PATIENTS ON A CASE TO CASE BASIS. TWENTY ONE OR MORE STATES HAVE HELPED AGAINST FIRING OF EMPLOYEES UNDER THE MEDICAL MARIJUANA ACT OR FOR TREATMENT THEREOF. YOU CANNOT TREAT PEOPLE IN ALABAMA ANY DIFFERENTLY IN ALABAMA THAN OTHER STATES WHICH WOULD CLEARLY BE A VIOLATION UNDER THE MEDICAL MARIJUANA ACT, AND THE AMERICAN DISABILITIES ACT. UNDER PALMITER II COMMON WEALTH

(cont.)

(3)

HEALTH SYSTEMS 1492 MDA 2020 SUPERIOR
COURT OF PENNSYLVANIA.

IN THIS CASE AT HAND BURNS
 WAS NOT GIVEN OPPORTUNITY FOR A DRUG SCREEN,
 AND A CHANCE TO CLEAN UP FOR A TEST OR TREAT-
 MENT OPTIONS. BURNS WAS TERMINATED IMMEDIATELY

THEREFORE WILL ALL PREMISES
 CONSIDERED AND THE HEARING OF THIS PETITION
 I PRAY THAT THIS COURT GRANT RELIEF SOUGHT
 IN SAID CAUSE

RESPECTFULLY SUBMITTED

Thomas A. Burns

UNKNOWN AFFIDAVIT

I HEREBY UNDER PENALTY
 OF PERJURY SWEAR THAT THE FOREGOING STATEMENTS ARE
 TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE

ON THIS THE 19TH DAY OF
SEPT. 2023

Thomas A. Burns
[Signature]

CEVTH

(4)

CERTIFICATE OF SERVICE

I HEREBY DECLARE THAT
A TRUE AND CORRECT COPY OF A CIVIL SUIT
BURNS V BRANDSAWAY SOLUTIONS WAS HAND
DELIVERED BY PLAINTIFF TO:

BRANDSAWAY SOLUTIONS

3512 BROOKDALE DR

MOBILE, AL 36608

AND TO

CLERK CIVIL/CIRCUIT

MOBILE GOV. PLAZA Rm 927

205 GOV. ST

MOBILE, AL 36602

ON THIS THE 19 TH

DAY OF ~~DEP~~ SEPT. 2023

Thomas A. Burns

THOMAS A. BURNS

7200 MELISSA DR

THEODORE, AL 36582

(251) 217-0817

THOMAS BURNS
7200 MELISSA DR
THEODORE, AL.
36592

CLERK CIVIL COURT
MOBILE GOV. PLAZA
205 GOV. ST.
MOBILE, AL - 36602

DATE: 9-19-23

RE: COMPLAINT: BURNS V BRAND
SARINAK SOLUTIONS

HONORABLE CLERK, I HOPE THIS FINDS YOU WELL
I'VE HAND SERVED A COMPLAINT AGAINST BRAND SARINAK
SOLUTIONS AND SENT A COPY TO THEM. PLEASE DIRECT
IT PROPERLY. ANY AND ALL CONSIDERATION ON MY
BEHALF IS DEEPLY APPRECIATED.

SERVED ON THIS THE 19TH
DAY OF SEPT. 2023

Thomas A. Burns

RESPECTFULLY, Thomas A. Burns

Thomas A. Burns

THOMAS A. BURNS
7200 MELISSA DR
THEODORE, AL 36592

Sharon A. [Signature]
CLERK OF CIRCUIT COURT

2023 SEP 25 10:11:25

FILED
2023 SEP 25 10:11:25



IN THE CIRCUIT COURT OF MOBILE COUNTY, ALABAMA

BURNS THOMAS A

)

Plaintiff,

)

)

v.

)

Case No.: CV-2023-901992.00

)

BRAND SAFWAY SOLUTIONS

)

Defendant.

)

ORDER ON AFFIDAVIT OF SUBSTANTIAL HARDSHIP

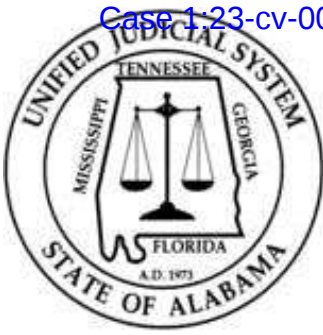
Affiant is indigent and request is GRANTED. The prepayment of docket fees is waived.

IT IS FURTHER ORDERED AND ADJUDGED that the court reserves the right and may order reimbursement of attorney's fees and expenses, approved by the court and paid to the appointed counsel, and costs of court.

DONE this 3rd day of October, 2023

/s/ S. WESLEY PIPES

CIRCUIT JUDGE



AlaFile E-Notice

02-CV-2023-901992.00

To: BRAND SAFWAY SOLUTIONS
3512 BROOKDALE DR
MOBILE, AL, 36608

NOTICE OF ELECTRONIC FILING

IN THE CIRCUIT COURT OF MOBILE COUNTY, ALABAMA

THOMAS A BURNS V. BRAND SAFWAY SOLUTIONS
02-CV-2023-901992.00

The following complaint was FILED on 9/25/2023 2:14:43 PM

Notice Date: 9/25/2023 2:14:43 PM

Service by sheriff in 02 - MOBILE County

SHARLA KNOX
CIRCUIT COURT CLERK
MOBILE COUNTY, ALABAMA
CIRCUIT CIVIL DIVISION
205 GOVERNMENT STREET
MOBILE, AL, 36644

251-574-8420
charles.lewis@alacourt.gov

State of Alabama Unified Judicial System Form C-34 Rev. 7/2023	SUMMONS - CIVIL -	Court Case Number 02-CV-2023-901992.00
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IN THE CIRCUIT COURT OF MOBILE COUNTY, ALABAMA
THOMAS A BURNS V. BRAND SAFWAY SOLUTIONS

NOTICE TO: BRAND SAFWAY SOLUTIONS, 3512 BROOKDALE DR, MOBILE, AL 36608

(Name and Address of Defendant)

THE COMPLAINT OR OTHER DOCUMENT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT, AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS. YOU OR YOUR ATTORNEY ARE REQUIRED TO FILE THE ORIGINAL OF YOUR WRITTEN ANSWER, EITHER ADMITTING OR DENYING EACH ALLEGATION IN THE COMPLAINT OR OTHER DOCUMENT, WITH THE CLERK OF THIS COURT. A COPY OF YOUR ANSWER MUST BE MAILED OR HAND DELIVERED BY YOU OR YOUR ATTORNEY TO THE PLAINTIFF(S) OR ATTORNEY(S) OF THE PLAINTIFF(S), THOMAS A BURNS

[Name(s) of Attorney(s)]

WHOSE ADDRESS(ES) IS/ARE: 7200 MELISSA DR, THEODORE, AL 36582

[Address(es) of Plaintiff(s) or Attorney(s)]

THIS ANSWER MUST BE MAILED OR DELIVERED WITHIN 30 DAYS AFTER THIS SUMMONS AND COMPLAINT OR OTHER DOCUMENT WERE SERVED ON YOU OR A JUDGMENT BY DEFAULT MAY BE RENDERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT OR OTHER DOCUMENT.

TO ANY SHERIFF OR ANY PERSON AUTHORIZED BY THE ALABAMA RULES OF CIVIL PROCEDURE TO SERVE PROCESS:

☒ You are hereby commanded to serve this Summons and a copy of the Complaint or other document in this action upon the above-named Defendant.

☐ Service by certified mail of this Summons is initiated upon the written request below of _____
 pursuant to the Alabama Rules of the Civil Procedure. *[Name(s)]*
 10/03/2023 /s/ SHARLA KNOX By: _____
(Date) *(Signature of Clerk)* *(Name)*

☐ Certified Mail is hereby requested. _____
(Plaintiff's/Attorney's Signature)

RETURN ON SERVICE

Certified Mail

☐ Return receipt of certified mail received in this office on _____
(Date)

Personal/Authorized

☐ I certify that I personally delivered a copy of this Summons and the Complaint or other document to _____ in _____ County, Alabama on _____.
(First and Last Name of Person Served) *(Name of County)* *(Date)*

Document left:

☐ with above-named Defendant;

☐ with an individual authorized to receive service of process pursuant to Rule 4(c), Alabama Rules of Civil Procedure;

☐ at the above-named Defendant's dwelling house or place or usual place of abode with some person of suitable age and discretion then residing therein.

Return of Non-Service

☐ I certify that service of process of this Summons and the Complaint or other document was refused by _____ in _____ County, Alabama on _____ who is:
(First and Last Name of Person Served) *(Name of County)* *(Date)*

☐ the above-named Defendant;

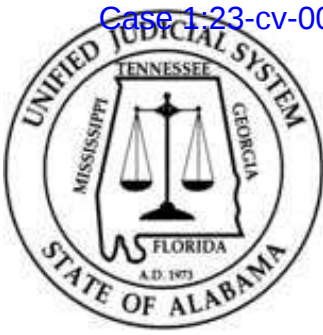
☐ an individual authorized to receive service of process pursuant to Rule 4(c), Alabama Rules of Civil Procedure;

☐ As a designated process server pursuant to Rule 4(i)(1)(B), Alabama Rules of Civil Procedure, I certify that I am at least 19 years of age, I am not a party to this proceeding, and I am not related within the third degree by blood or marriage to the party seeking service of process.

(Type of Process Server) _____
(Server's Signature) _____
(Address of Server)

(Badge or Precinct Number of Sheriff or Constable) _____
(Server's Printed Name)

(Badge or Precinct Number of Sheriff or Constable) _____
(Telephone Number of Designated Process Server)



AlaFile E-Notice

02-CV-2023-901992.00

Judge: S. WESLEY PIPES

To: BURNS THOMAS A (PRO SE)
7200 MELISSA DR
THEODORE, AL, 36582-0000

NOTICE OF ELECTRONIC FILING

IN THE CIRCUIT COURT OF MOBILE COUNTY, ALABAMA

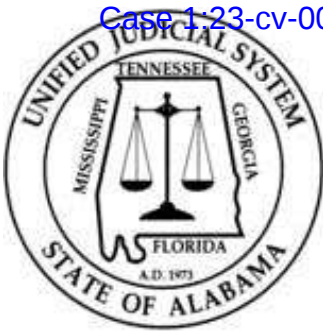
THOMAS A BURNS V. BRAND SAFWAY SOLUTIONS
02-CV-2023-901992.00

The following matter was FILED on 10/3/2023 11:08:32 AM

Notice Date: 10/3/2023 11:08:32 AM

SHARLA KNOX
CIRCUIT COURT CLERK
MOBILE COUNTY, ALABAMA
CIRCUIT CIVIL DIVISION
205 GOVERNMENT STREET
MOBILE, AL, 36644

251-574-8420
charles.lewis@alacourt.gov



AlaFile E-Notice

02-CV-2023-901992.00

Judge: S. WESLEY PIPES

To: BRAND SAFWAY SOLUTIONS (PRO SE)
3512 BROOKDALE DR
MOBILE, AL, 36608-0000

NOTICE OF ELECTRONIC FILING

IN THE CIRCUIT COURT OF MOBILE COUNTY, ALABAMA

THOMAS A BURNS V. BRAND SAFWAY SOLUTIONS
02-CV-2023-901992.00

The following matter was FILED on 10/3/2023 11:08:32 AM

Notice Date: 10/3/2023 11:08:32 AM

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CIRCUIT CIVIL DIVISION
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Revised 4-1-99; 11-1-99; 11-3-05

IN THE CIRCUIT COURT OF MOBILE COUNTY, ALABAMA

_____	*	
_____	*	
Plaintiff,	*	
	*	
VS.	*	CIVIL ACTION NO. _____
_____	*	
_____	*	
Defendant.	*	

GENERAL PRE-TRIAL ORDER

To expedite pre-trial and trial procedure, it is ORDERED by the Court that the following will apply:

1. EXHIBITS, DOCUMENTS, AND PHYSICAL EVIDENCE GENERALLY

a. Each party shall identify in writing to all other parties and shall make all documents, exhibits and physical evidence, or copies thereof, expected to be used in the case in chief available to the other parties, not less than 21 days prior to trial, for inspection and copying. The same shall then be authenticated and admitted into evidence without further proof, unless written objections to any such documents or exhibits be made to the Court not less than 14 days prior to trial specifying the grounds of objection to the genuineness and relevancy of the proposed document, exhibit, or physical evidence. The requirement does not apply to documents, exhibits and physical evidence used solely as impeachment evidence.

b. Documents, exhibits or physical evidence not timely exhibited to or made available to other parties prior to trial under this Order will not be admitted into evidence at the trial unless solely for impeachment purposes or unless the ends of justice so require.

c. Documents, exhibits or physical evidence so admitted hereunder shall be presented to the court reporter for marking in evidence prior to trial.

2. DOCTOR, HOSPITAL AND MEDICAL EXPENSES

a. If applicable, all doctor, medical and hospital bills shall be sent to or made available to all parties not less than 21 days before trial and shall be admitted in evidence as reasonable without further proof, unless written objection to any such bills be made to the Court no less than 14 days before trial specifying the grounds for objection.

b. Any such bills not timely exhibited to the other parties will not be admitted in evidence at trial unless the ends of justice so require.

c. The bills so admitted shall be presented to the court reporter for marking in evidence prior to trial.

3. SPECIAL DAMAGES

a. All parties seeking special damages shall furnish the other parties with a list thereof not less than 21 days before trial. Written objections thereto may be made not less than 14 days before trial specifying grounds of objections.

b. Evidence of special damages claimed, but not timely exhibited to other parties, will not be admitted into evidence unless the ends of justice require so.

4. AGENCY-TIME AND PLACE-DUTY

a. Agency and the time and place of the incident involved, if alleged in the complaint, and, if a negligence case, the existence of a duty, are admitted and the parties are deemed correctly named and designated unless specifically denied by answer or unless written objection is made not less than 14 days before trial. The objections shall include the correct name and entity and/or the grounds relied on.

5. EXPERTS

a. Unless previously obtained by discovery, each party will furnish to all other parties the names, addresses and qualifications of all expert witnesses expected to testify, together with a brief summary of their opinions. Such disclosure of experts shall be made by the party filing the Motion to Set and Certificate of Readiness not later than the time of filing such motion. Disclosure by all parties shall be made not later than 14 days after the filing of the Motion to Set and Certificate of Readiness.

b. Disclosure of experts in cases not included in the Fasttrack system shall be made by all parties not less than 60 days before trial.

c. Unless written objection to the qualifications of an expert is made not later than 30 days before trial, stating grounds, the qualification of such expert will be admitted.

d. Upon calling an expert to testify at trial, the attorney may state to the Court and jury the name, address and summary of the qualifications of the expert.

6. DISCOVERY

Discovery shall be completed 30 days prior to the trial date. On written motion for good cause shown, the court may allow discovery within this 30-day period.

7. JURY INSTRUCTIONS

If the case is to be tried by a jury, requested written charges shall be submitted to the Court not later than the close of the plaintiff's case, subject to supplementation during the course of the trial on matters which could not be reasonably anticipated. Each requested charge will be typed on letter size paper and identified by the party's last name and shall be numbered.

8. JURY SELECTION

Before the commencement of trial, the parties will furnish or advise the court, outside the presence of the jury, the names of all insurance companies involved and any special voir dire questions for the purpose of qualifying the jury.

9. **DUTY TO SUPPLEMENT DISCOVERY**

All parties are under duty to supplement responses to discovery as provided by Rule 26(e)(3) ARCP which should be done not less than 30 days before trial.

10. **MOTIONS GENERALLY**

If motion to strike or motion to dismiss a pleading is filed, the Court will not consider such unless a copy of the pleading sought to be struck or dismissed is attached thereto.

11. **CONFLICTS**

In the event of scheduling conflict affected counsel shall comply with the Attorney Calendar Conflict Resolution Order of the Alabama Supreme Court.

It is further ORDERED by the Court that the Court will reconsider any portion of the General Pre-Trial Order upon timely application by any party.

Done this the _____ day of _____



Presiding Judge, S. Wesley Pipes